

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Ezekiel Ta ROULETTE-BRUNNER

Case No.

2:25-mj-166

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 03/18/2025 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

18 USC 922(g)(1)

Offense Description

Knowingly Possess a Firearm by a Convicted Felon

This criminal complaint is based on these facts:

SEE ATTACHED

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

VIA FACETIME

Date:

MARCH 25, 2025

City and state:

Columbus, OH

Joshua C. Wright

Complainant's signature

Joshua C. Wright

Printed name and title

Elizabeth Preston Deavers

Judge's signature

Elizabeth Preston Deavers, U.S. Magistrate Judge

Printed name and title

PROBABLE CAUSE AFFIDAVIT
Ezekiel Ta ROULETTE-BRUNNER

I, Joshua C. Wright, being duly sworn, depose and state that:

1. I have been a Police Officer with the Columbus, Ohio Division of Police since 2010. I have been a Task Force Officer (TFO) with the United States Department of Justice, Bureau of Alcohol, Tobacco Firearms, and Explosives since November 2020. I am familiar with State and Federal criminal laws pertaining to firearms and narcotics violations.
2. On October 17th, 1996, Ezekiel Ta ROULETTE-BRUNNER (hereinafter ROULETTE-BRUNNER) was convicted of two counts of Sexual Battery, felonies of the 3rd degree (96CR002099) in the Franklin County, Ohio Court of Common Pleas.
3. On or about March 18th, 2025, at approximately 1838hrs, Columbus, Ohio Division of Police officers were dispatched on a call for service to 2210 Dartmouth Avenue, Columbus, Ohio 43219 regarding a person with a firearm. The complainant informed the Columbus, Ohio Division of Police dispatcher that ROULETTE-BRUNNER was threatening the complainant with a firearm.
4. Upon arrival Columbus, Ohio Division of Police officers were informed that ROULETTE-BRUNNER had fled the residence just prior to the officers' arrival and that ROULETTE-BRUNNER had removed a firearm lockbox containing a firearm (German Sports Gun, GSG-1911, .22 cal LR, serial number: A840262). Officers located the aforementioned firearm lockbox in the backyard of the residence and observed the firearm lockbox had been smashed open with a hammer which was also observed close to the lockbox.
5. A short time later Columbus, Ohio Division of Police officers circulating the area observed ROULETTE-BRUNNER in the area of E. 5th Avenue and 670. Upon observing the officers ROULETTE-BRUNNER ran thorough a wooded area to evade officers but was apprehended a short distance later in the area of 711 Hayden Park Drive, Columbus, Ohio 43219 without further incident. ROULETTE-BRUNNER was asked where the aforementioned firearm was. ROULETTE-BRUNNER stated he no longer had the firearm, that he had hid the firearm somewhere and that he would take the officers to the firearm. ROULETTE-BRUNNER directed the officers to the alley in the rear of 2288 Willamont Avenue, Columbus, Ohio 43219 under a leather chair and the German Sports Gun, GSG-1911, .22 cal LR, serial number: A840262 was recovered. The firearm was found loaded with eight .22 cal rounds in the magazine. The firearm, magazine and ammunition were transported to the Columbus, Ohio Division of Police property control unit as evidence.
6. ROULETTE-BRUNNER was read his constitutional rights and agreed to answer questions without an attorney present. During questioning ROULETTE-BRUNNER admitted to being in possession of the firearm lockbox with the previously mentioned firearm inside and breaking

PROBABLE CAUSE AFFIDAVIT
Ezekiel Ta ROULETTE-BRUNNER

open the firearm lockbox with a hammer. A copy of the constitutional rights waiver and all audio/video recordings will be maintained as evidence.

7. A verbal Interstate Nexus Determination was conducted by ATF Special Agent Cole Benner on the aforementioned firearm. It was determined that the aforementioned firearm seized from ROULETTE-BRUNNER on or about March 18th, 2025, was NOT manufactured in the State of Ohio and therefore travelled in interstate commerce to reach the State of Ohio.
8. The aforementioned offense occurred in Franklin County, Ohio, in the Southern Judicial District of Ohio.
9. Based on this information, your affiant believes probable cause exists that Ezekiel Ta ROULETTE-BRUNNER possessed a firearm and ammunition after having been convicted of a crime punishable by more than one year incarceration, in violation of 18 U.S.C. 922(g)(1).

Joshua C. Wright
Joshua C. Wright

ATF Task Force Officer

Sworn to and subscribed before me this day of 25th, March 2025, at 4:16 PM Columbus, Ohio.

Elizabeth A. Preston Deavers
Elizabeth A. Preston Deavers
U.S. MAGISTRATE JUDGE

